Craig K. Perry
Nevada Bar # 003786
CRAIG K. PERRY & ASSOCIATES
8010 W. Sahara Avenue, Suite 260
Las Vegas, Nevada 89117
(702) 228-4777 Telephone
(702) 943-7520 Fax
info@1stoplawfirm.com
Attorneys for Plaintiffs

Louie J. Cook, Esq.
(Pro Hac Vice Pending)
SICO HOELSCHER HARRIS & BRAUGH, LLP
802 N. Carancahu, Suite 900
Corpus Christy, TX 78401
(877) 653-3334 Telephone
lcook@shhblaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RIGOBERTO PLATA MATAMOROS, Individually, ELSA YANES MATUTE DE PLATA, individually and as the Administrator Of the Estate of IVAN ENRIQUE PLATA-YANES, Deceased. Plaintiffs, vs. GENERAL MOTORS, LLC, d/b/a CHEVROLET, DOES I through V and ROE ENTITIES, I through V, Inclusively, Defendants.	Case No. 2;17-cv-00578 **JOINT STIPULATED DISCOVER PLAN AND SCHEDULING ORDER** [SPECIAL SCHEDULING REVIEW REQUESTED]

The Parties, through their undersigned counsel, submit the following Stipulated Discovery. Plan and Scheduling Order:

1. **Discovery Cut Off Date**. The parties request Three Hundred Sixty-five (365) days for

discovery calendared from the time Defendant GENERAL MOTORS answered the Complaint on March 14, 2017 Accordingly, discovery shall be completed on or before **Wednesday, March 14, 2018.**

2. **Amending the Pleadings and Adding Parties**. Motions to amend the pleadings or add Parties (Fed.R.Civ.P. 13, 14, 19 and 20) shall be filed within ninety (90) days prior to the close of discovery or by **Thursday, December 14, 2017.**

3. **Fed.R.Civ.P. 26(a)(2) Disclosures (Experts)**. The parties shall disclose experts no later than sixty (60) days before the discovery cut-off or on or before **Plaintiff: Tuesday, November 14, 2017; Defendant: Thursday, December 14, 2017** and disclosures regarding rebuttal expert witnesses shall be made no later than thirty (30) days after the initial disclosures of experts or before **Monday, February 12, 2018.**

At the time of disclosures of expert witnesses, each party shall comply with the disclosures requirements set forth in Fed.R.Civ.P. 26(2)(B).

4. **Dispositive Motions:** Dispositive motions shall be filed no later than thirty (30) days after the discovery cut-off or before **Friday, April 13, 2018.**

5. **Pretrial Order**. The joint pretrial order shall be filed no later than sixty (60) days after the date set for filing dispositive motions or **Tuesday, June 12, 2018.** In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after the decision on the dispositive motions or until further order of the court.

6. **Fed.R.Civ.P.26(a)(3) Disclosures**. Disclosures are required by Fed.R.Civ.P. 26(a)(3) and any objections hereto shall be included in the pretrial order.

a. Fed.R.Civ.P. 26(f) Conference. On April 12, 2017 at 1:30 p.m. participated in a conference call to discuss all of the issues address in Fed.R.Civ.P. 26(f): Craig K. Perry, counsel for Plaintiff David M. Rapp.

b. Fed.R.Civ.P. 26(a) Changes. None. The parties agree to make initial disclosures pursuant to Fed.R.Civ.P. 26(a) on or before [May 12, 2017] [30 days after conference]

c. Fed.R.Civ.P. 26(f)(3)(A)-(B) Scope and Timing of Discovery. Discovery should not be limited to any particular issues.

Reason for Requesting Special Scheduling Review:

The parties request a discovery period in excess of 180 days as contemplated by LR26-1(e) because this is a complicated product liability law suit against an automobile manufacturer arising from a rollover accident that happened in Nevada involving a 2008 Chevrolet Express. In their Complaint, Plaintiff allege that were injured due to design defects in the vehicle's restraint, stability and handling, and glazing characteristic. Consequently, this lawsuit will involve detailed engineering issues relating to the design of the subject 2008 Chevrolet Express.

Examples of the extensive discovery that needs to be conducted in this case include:

(a) A detailed investigation must be conducted with regard to the accident;

(b) Written discovery must be served on Plaintiff and Defendants and subpoenas issued to responding agencies and Plaintiffs' medical providers.

(c) Depositions of fact witnesses, including, but not limited to, the following people, eyewitnesses, investigating police officers, first responders, and medical providers; and

(d) Expert witnesses must be retained to investigate the accident.

PROPOSED SCHEDULE:

i. Last day to complete discovery: **Wednesday, March 14, 2018.**

ii. Last day to amend pleadings and add parties: **Thursday, December 14, 2017.**

iii. Last day to file interim status report: **Monday, January 15, 2018.**

[LR 26-3. Interim Status Reports. Sixty (60) days before discovery cut off]

iv. Last day to disclose experts pursuant to Fed.R.Civ.P. 26(a)(2):

Plaintiff: Tuesday, November 14, 2017; Defendant: Thursday, December 14, 2017.

v. Last day to disclose rebuttal experts: **Monday, February 12, 2018.**

vi. Last day to file dispositive motions: **Friday, April 13, 2018.**

vii. Last day to file Joint Pretrial Order: **Tuesday, June 12, 2018.**

Fed.R.Civ.P. 26(f)(3)(C) Electronically stored information. The parties agree that, since some information is in electronic form. Each party may produce to the other party the information on the same storage medium in the same format as the original information. By way of exampled where there are way, files on a CD, the producing party may make an exact copy of those by way of files to a blank CD and then produce the same to the other party.

d. Fed.R.Civ.P. 26(f)(3)(E) Changes. None at this time.
e. Fed.R.Civ.P. 26(f)(3)(F) Orders. None at this time.

///

///

///

///

///

///

///

///

///

///

///

///

///

///

///

[SIGNATURE PAGE TO FOLLOW]

DATED this ____of _______________, 2017

CRAIG K. PERRY & ASSOCIATES

/s/ Craig K. Perry

____

Craig K. Perry
Nevada Bar # 003786
8010 W. Sahara Avenue, Suite 260
Las Vegas, Nevada 89117
(702) 228-4777 Telephone
(702) 943-7520 Fax
info@1stoplawfirm.com
Attorney for Plaintiff

DATE this ___day of ___________, 2017

SICO HOELSCHER HARRIS & BRAUGH LLP

/s/ Louis J. Cook, Esq.

____

Louie J. Cook, Esq.
Pro Hac Vice
802 N. Carancahu, Suite 900
Corpus Christy, TX 78401
(877) 653-3334 Telephone
lcook@shhblaw.com
Attorney for Plaintiff

DATED ___ day of ______________2017

SNELL & WILMER LLP

/s/ Alexandria LaVonne Layton, Esq.

____

Alexandria LaVonne Layton, Esq.
3883 Howard Hughes Pkwy., Ste 1100
Las Vegas, NV 89169
702-784-5236
Fax: 702-784-5252
Email: alayton@swlaw.com
Attorneys for Defendant
General Motors

DATED ____day of ______________2017

SNELL & WILMER LLP

/s/ Vaughn A. Crawford, Esq.

____

Vaughn A Crawford, Esq.
400 E. Van Buren Street
One Arizona Center
Phoenix, AZ 85004
602-382-6368
Fax: 602-382-6070
Email: vcrawford@swlaw.com
Attorneys for Defendant
General Motors

IT IS SO ORDERED:

____
UNITED STATES ~~DISTRICT~~ JUDGE
Magistrate

DATED: April 27, 2017